

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION

UNITED STATES OF AMERICA

§
§ No. 9:19CR 33

v.

§
§ Judge Clark J. Hawthorn

TRAVIS WADE ELLIS (1)
JAMES WORSHAM (2)

§
§

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

INDICTMENT

AUG - 7 2019

THE UNITED STATES GRAND JURY CHARGES:

BY
DEPUTY _____

Count One

Violation: 21 U.S.C. § 846
(Conspiracy to Distribute and to Possess
with Intent to Distribute a Controlled
Substance)

On or about October 1, 2018 continuing until on or about June, 2019, the exact dates being unknown to the Grand Jury, in the Eastern District of Texas and elsewhere, **Travis Wade Ellis and James Worsham**, defendants, did knowingly and intentionally conspire and agree with each other, and with persons known and unknown to the Grand Jury, to distribute and to possess with intent to distribute 50 grams or more of methamphetamine “actual”, a Schedule II controlled substance.

In violation of 21 U.S.C. § 846.

Count Two

Violation: 18 U.S.C. 922(g)(1)
(Possession of a Firearm by a Prohibited Person)

On or about October 16, 2018, in the Eastern District of Texas, **Travis Wade Ellis**, defendant, did knowingly and unlawfully possess in and affecting interstate or foreign commerce, a firearm, to wit: a Glock 42, .380 caliber pistol, bearing serial number ACRF879, while knowing that he had been convicted of a crime or crimes punishable by imprisonment for a term exceeding one year, to wit: Possession of Controlled Substance, a felony, on August 9, 2018, in cause number F1420779, in the 420th Judicial District Court of Nacogdoches County, Texas.

In violation of 18 U.S.C. 922(g)(1).

Count Three

Violation: 18 U.S.C. § 924(c)
(Possession of a Firearm in Furtherance of Drug Trafficking Crime)

On or about October 16, 2018, in the Eastern District of Texas, **Travis Wade Ellis**, defendant, did knowingly possess a firearm, one (1) Glock 42, .380 caliber pistol, bearing serial number ACRF879, during and in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, for a violation of 21 U.S.C. § 846, Conspiracy to Distribute and Possess with the Intent to Distribute a Controlled Substance, as alleged in Count One.

In violation of 18 U.S.C. § 924(c).

Count Four

Violation: 18 U.S.C. 922(g)(1)
(Possession of a Firearm by a Prohibited Person)

On or about May 23, 2019, in the Eastern District of Texas, **Travis Wade Ellis**, defendant, did knowingly and unlawfully possess in and affecting interstate or foreign commerce, a firearm, to wit: a HiPoint, model C9, 9 millimeter pistol, bearing serial number P10000842, while knowing that he had been convicted of a crime or crimes punishable by imprisonment for a term exceeding one year, to wit: Possession of Controlled Substance, a felony, on August 9, 2018, in cause number F1420779, in the 420th Judicial District Court of Nacogdoches County, Texas.

In violation of 18 U.S.C. 922(g)(1).

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

Criminal Forfeiture Pursuant to 21 U.S.C. § 853, 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)

Upon conviction of the offenses alleged in this indictment, defendants herein, shall forfeit to the United States pursuant to 21 U.S.C. § 853, 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any property constituting, or derived from, proceeds obtained directly, or indirectly, as a result of the said violation, and any property used, or intended to be used in any manner or part, to commit or to facilitate the commission of the said violation, including but not limited to the following:

FIREARMS

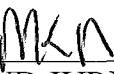
- a. One (1) Glock 42, .380 caliber pistol, bearing serial number ACRF879;
- b. One (1) HiPoint, model C9, 9 millimeter pistol, bearing serial number P10000842.

c. Any associated ammunition.

MONEY JUDGMENT

A sum of money equal to **\$2,200.00** in United States currency, representing the amount of proceeds that could be obtained as a result of the offenses alleged in Count One and Count Four of the indictment for which the defendants are personally liable for \$1,100.00 each.

A TRUE BILL



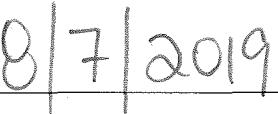
GRAND JURY FOREPERSON

JOSEPH D. BROWN
UNITED STATES ATTORNEY



LAUREN GASTON
Assistant United States Attorney

Date



8/7/2019

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION

UNITED STATES OF AMERICA

§
§ No. 9:19CR33

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§
§ Judge _____

TRAVIS WADE ELLIS (1)
JAMES WORSHAM (2)

§
§

NOTICE OF PENALTY

Count One

Violation: 21 U.S.C. § 846

Penalty: Conspiracy to Distribute and to Possess with the Intent to Distribute a Controlled Substance

If 50 grams or more of methamphetamine (actual) its salts, isomers, and salts of its isomers or 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine - imprisonment of not less than 10 years, but not more than life, a fine not to exceed \$10 million (or twice any pecuniary gain to the defendant or loss to any victim), or both - supervised release of at least 5 years, but not more than life;

If 5 grams or more of methamphetamine (actual) its salts, isomers, and salts of its isomers or 50 grams or more, but less than 500 grams of a mixture or substance containing a detectable amount of methamphetamine - imprisonment of not less than 5 years, but not more than 40 years, a fine not to exceed \$5 million (or twice any pecuniary gain to the defendant or loss to any victim), or both, and supervised release of at least 4 years, but not more than life;

If less than 50 grams of a mixture or substance containing a detectable amount of methamphetamine - not more than 20 years imprisonment, a fine not to exceed \$1 million (or twice any pecuniary gain to the defendant or loss to any victim), or both, and supervised release of at least 3 years, but not more than life.

Special Assessment: \$100.00

Counts Two and Four

Violation: 18 U.S.C. 922(g)(1)

Penalty: Possession of a Firearm by a Prohibited Person

Imprisonment of not more than ten (10) years, a fine not to exceed \$250,000 or twice the pecuniary gain to the defendant or loss to the victim, or both imprisonment and a fine; and a term of supervised release of not more than three (3) years. If the Court determines that the defendant is an Armed Career Offender under 18 U.S.C. § 924(e), imprisonment of not less than 15 years and not more than life, a fine not to exceed \$250,000 or twice the pecuniary gain to the defendant or loss to the victim, or both; a term of supervised release of not more than five (5) years.

Special Assessment: \$100.00

Count Three

Violation: 18 U.S.C. 924(c)

Penalty: Possession of a Firearm in Furtherance of a Drug Trafficking Crime

Imprisonment of not less than 5 years or more than life, unless the firearm is brandished, in which case the minimum is 7 years, or unless the firearm is discharged, in which case the minimum sentence is 10 years, which must be served consecutively to any other term of imprisonment, a fine not to exceed \$250,000.00, or both; and supervised release of not more than five (5) years.

In the case of a second or subsequent conviction, imprisonment of not less than 25 years which must be served consecutively to any other term of imprisonment, a fine not to exceed \$250,000.00, or both; and supervised release of not more than five (5) years.

Special Assessment: \$100.00